

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA and
STATE OF NEW JERSEY *ex rel.* RAFI
KHATCHIKIAN and IVAN TORRES,

Plaintiffs/Relators,

v.

PORT IMPERIAL FERRY
CORPORATION; PORT IMPERIAL
FERRY CORPORATION d/b/a NY
WATERWAY; ARTHUR IMPERATORE,
President; ALAN WARREN, Vice President;
ROMULUS DEVELOPMENT CORP.;
BILLYBEY FERRY COMPANY, LLC;
WILLIAM WACHTEL; ABC
CORPORATIONS 1-10 (same names being
fictitious) and JOHN DOES 1-10 (same
names being fictitious),

Defendants.

Civil Action No.: 2:16-cv-2388 (KM) (AME)

[PROPOSED] ORDER

THIS MATTER having come before the Court upon the application of Defendants Port Imperial Ferry Corporation, Port Imperial Ferry Corporation d/b/a NY Waterway, Arthur Imperatore, Romulus Development Corp., and Billybey Ferry Company, LLC, by and through their attorneys, Baldassare & Mara, LLC (Jennifer Mara, Esq., appearing), for the entry of an Order dismissing Count Six of the First Amended Complaint; and the Court having considered the arguments of the parties; and for good cause shown;

IT IS on this _____ day of _____, 2022,

ORDERED that Count Six of the First Amended Complaint is DISMISSED WITH PREJUDICE.

HONORABLE KEVIN MCNULTY
United States District Judge